

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JANNEY MONTGOMERY SCOTT LLC,

Plaintiff,

-against-

FRANK GREENBERG, KAREL  
GREENBERG, MARK LICHTER, and  
KATHERINE LICHTER,

Defendants.  
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Case No.: 10 cv 4248 (LAK)

**DECLARATION OF TAMAQUA ROLAND**

1. My name is Tamaqua B. Roland. I am over the age of 18 and give this declaration from my own personal knowledge.

2. My current title is Litigation Paralegal for Janney Montgomery Scott LLC ("Janney"). I began working for Janney in March 2004 as a sales assistant. In June 2006, I transferred to Janney's legal department as Paralegal/Legal Admin. In November 2008, I became Litigation Paralegal, my current position.

3. I am familiar with Janney's filing systems, record retention policies, and the forms used by Janney for opening new accounts.

4. It is Janney's customary business practice to retain the account agreements signed by Janney's clients. The front page of each account agreement is imaged and stored electronically in an electronic platform called Stellent. The paper copy of the account agreement, including the terms and conditions on the back page, are stored in an off-site records facility.

5. I conducted a search of Janney's books and records to determine if Janney has any information related to Defendants Frank Greenberg, Karel Greenberg, Mark Lichter, and Katherine Lichter ("Defendants"). This search encompassed the relevant time period of 2003 to the present.

6. The search revealed that Janney has no record of any documents, accounts, or files related to anyone named Mark Lichter, Katherine Lichter, or Karel Greenberg.

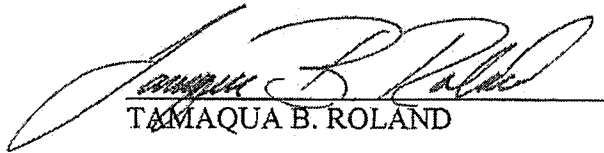
7. Although I found records relating to an individual named Frank Greenberg, there is no record of any documents, accounts or files related to anyone named Frank Greenberg who is either a New York resident or married to someone named Karel Greenberg.

8. Based on this search, I verified that Janney did not enter into any agreement, including any customer agreement or arbitration agreement, with any of Defendants.

9. From this search, I also verified that Defendants did not open or maintain any accounts at Janney.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 25, 2010

  
TAMAQUA B. ROLAND